

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**IN RE: Amanda Pendo
Brian Pendo**

Debtor(s)

**PNC BANK, NATIONAL ASSOCIATION
Movant**

vs.

**Amanda Pendo
Brian Pendo**

Debtor(s)

Ronda J. Winnecour,

Trustee

BK NO. 24-20784 CMB

Chapter 13

Related to Doc 42

**RESPONSE TO DEBTORS MOTION TO SELL PROPERTY OF THE ESTATE
PURSUANT TO 11 U.S.C. 363(b)**

PNC Bank, N.A. enters its response to the Debtor's Motion to Pursuant to Bankruptcy Code Section 363 for Authority to Sell Real Estate Located at 3232 Newmark Drive, Miamisburg, OH 45342 Free and Clear of Liens and Encumbrances and to Permit Distribution of Sale Proceeds.

1. Creditor's loan is secured by a mortgage on Debtor's property at 3232 Newmark Drive, Miamisburg, OH 45342.
2. Creditor would not object to the sale so long as the Order entered is clear that the sale is not free and clear of secured creditors lien and same shall remain on the property until such time that it is paid in full.

WHEREFORE, the Movant, PNC Bank, N.A., prays that the Court enters an Order requiring the Secured Creditor to be paid in full.

Date: June 25, 2024

Respectfully submitted,

/s/ Brent J. Lemon

Brent J. Lemon

Attorney I.D.

KML Law Group, P.C.

BNY Mellon Independence Center

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**CERTIFICATE OF SERVICE
RESPONSE TO MOTION FOR APPROVAL OF SALE FREE AND CLEAR OF
ALL LIENS, CLAIMS AND ENCUMBRANCES**

I, Brent J. Lemon of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on June 25, 2024, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below:

Debtor(s)

Amanda Pendo
331 State Street
Charleroi, PA 15022

Brian Pendo
331 State Street
Charleroi, PA 15022

Attorney for Debtor(s) (via ECF)

Scott R. Lowden, Esq.
100 Heathmore Avenue
Pittsburgh, PA 15227

Trustee (via ECF)

Ronda J. Winnecour
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219

Method of Service: electronic means or first-class mail.

Dated: June 25, 2024

/s/ Brent J. Lemon

Brent J. Lemon
Attorney I.D.
KML Law Group, P.C.
BNY Mellon Independence Center
701 Market Street, Suite 5000
Philadelphia, PA 19106
blemon@kmlawgroup.com